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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

LAURA HANSON,

Plaintiff,

v.

**STATE OF OREGON LEGISLATIVE
ASSEMBLY,**

Defendant.

Case No. 3:21-CV-00780-SI

PLAINTIFF'S TRIAL EXHIBITS

PLAINTIFF'S TRIAL EXHIBITS

Plaintiff Laura Hanson submits the following list of exhibits which may be used at trial. Plaintiff also reserves the right to amend this list and add additional exhibits, including rebuttal exhibits, and exhibits listed on plaintiff's exhibit list.

Exhibit No.	Bates Begin	Bates End	Description	Marked	Offered	Received
1	Hanson_Defendants_009154	Hanson_Defendants_009159	Nov. 14, 2018 Legislative Assistant Position Description			
2	HANSON002594	HANSON002596	Dec. 5, 2018 Hire Form & Pay Letter			
3			Legislative Branch Personnel Rule 27 (revised) – Effective June 29, 2019			
4	Hanson_Defendants_000392	Hanson_Defendants_000392	Legislative Branch Personnel Rule 5A: ADA			
5	HANSON001662	HANSON001996	Text messages b/w Hanson & Gelser			
6	Hanson_Defendants_069890	Hanson_Defendants_069896	Dec. 17, 2019 Memo from Hanson to Gelser			
7	Hanson_Defendants_069908	Hanson_Defendants_069915	Response from Gelser to Hanson's Dec. 17, 2019 Memo			
8	Hanson_Defendants_070017	Hanson_Defendants_070025	Dec. 18, 2019 Memo from Hanson to Gelser			
9	Hanson_Defendants_070058	Hanson_Defendants_070060	Response from Gelser to Hanson's Dec. 18, 2019 Memo			
10	Hanson_Defendants_070062	Hanson_Defendants_070064	Reply from Hanson to Gelser's Response to Dec. 18, 2019 Memo			
11	Hanson_Defendants_070149	Hanson_Defendants_070152	Dec. 19, 2019 Memo from Hanson to Gelser			
12	Hanson_Defendants_070175	Hanson_Defendants_070176	Response from Gelser to Hanson's Dec. 19, 2019 Memo			
13	Hanson_Defendants_009162	Hanson_Defendants_009163	Christmas card from Hanson to Gelser			
14	Hanson_Defendants_070331	Hanson_Defendants_070331	Dec. 27, 2019 Email from Hanson to Gelser			
15	Hanson_Defendants_009132	Hanson_Defendants_009132	Dec. 30, 2019 Handwritten note re: panic attacks			
16	Hanson_Defendants_009133	Hanson_Defendants_009136	Dec. 31, 2019 Handwritten notes re: Hanson			
17	Hanson_Defendants_004044	Hanson_Defendants_004049	Jan. 2, 2020 Email Exchange b/w Hanson & Knieling			

Exhibit No.	Bates Begin	Bates End	Description	Marked	Offered	Received
18	Hanson_Defendants_004050	Hanson_Defendants_004050	Jan. 2, 2020 Email from Baumgart to Knieling RE: I connected with Laura.			
19	HANSON002695	HANSON002699	Stoel Rives Bio - Brenda Baumgart			
20	Hanson_Defendants_009170	Hanson_Defendants_009173	Jan. 2, 2020 Email Exchange b/w Knieling & Gelser			
21	Hanson_Defendants_070824	Hanson_Defendants_070825	Jan. 3, 2020 Email Exchange b/w Hanson, Mele & Knieling RE: Question about office expenses			
22	Hanson_Defendants_070872	Hanson_Defendants_070873	Jan. 5, 2020 Email Exchange b/w Hanson & Knieling RE: Confused about process			
23	Hanson_Defendants_004055	Hanson_Defendants_004057	Jan. 5, 2020 Email from Knieling to Baumgart Fwd: Confused about process			
24	Hanson_Defendants_004062	Hanson_Defendants_004064	Jan. 6, 2020 Email from Knieling to Baumgart RE: Hanson's Memo of Admin. Leave			
25	Hanson_Defendants_070945	Hanson_Defendants_070945	Jan. 6, 2020 Email from Knieling to Hanson & Gelser RE: Meeting at 11			
26	Hanson_Defendants_000733	Hanson_Defendants_000734	Jan. 6, 2020 Memo to Hanson RE: Paid Admin. Leave			
27	HANSON008864	HANSON008865	Jan. 10, 2020 Memo From Tom Powers RE: HCR 20 – Personnel Rule 27 and Complaints Against Legislators			
28	Hanson_Defendants_000736	Hanson_Defendants_000736	Jan. 20, 2020 Hanson FMLA Certification			
29	HANSON001521	HANSON001525	Jan. 27, 2020 Email from Hanson to Sandmeyer RE: Rule 27 Investigation			
30	Hanson_Defendants_000956	Hanson_Defendants_000957	Jan. 29, 2020 Memo From Sandmeyer to Hanson RE: Follow-up Q&A			

Exhibit No.	Bates Begin	Bates End	Description	Marked	Offered	Received
31	Hanson_Defendants_000809	Hanson_Defendants_000810	Jan. 15, 2020 Email from Hanson to Knieling RE: Follow up			
32			July 9, 2020 Email from Sandmeyer to Hanson RE: Confidential Communication-do not forward			
33	Hanson_Defendants_000641	Hanson_Defendants_000642	Legislative Branch Personnel Rule 8: Americans with Disabilities Act (2020 update)			
34	Hanson_Defendants_000511	Hanson_Defendants_000526	House Concurrent Resolution 221			
35	HANSON000396	HANSON000397	Sept. 4, 2020 Email Exchange b/w Knieling & Holley RE: Laura Hanson's suspension from work			
36	Hanson_Defendants_003633	Hanson_Defendants_003641	Oct. 6, 2020 Memo from Sen. Prozanski RE: Conduct chair agenda 10.7.2020			
37	HANSON001526	HANSON001526	Oct. 7, 2020 Memo from Gelser to Hanson RE: Termination of Employment			
38			Oct. 13, 2020 BOLI Complaint			
39			Dec. 29, 2020 Letter from BOLI RE: Acceptance of Complaint			
40			Oct. 16, 2020 Tort Claim Notice			
41	HANSON006639 HANSON006649	HANSON006649 HANSON006659	Sabrina Ullmann Mathews Therapy Records and Bills			
42			August 4, 2022 Declaration of Nathan Monson			
43	Hanson_Defendants_000744	Hanson_Defendants_000781	Laura Hanson Workday File			
44	Hanson_Defendants_075747	Hanson_Defendants_075748	Dec. 21, 2022 Email from Ye to Pham RE: Question regarding Legislative Assistant position			

Exhibit No.	Bates Begin	Bates End	Description	Marked	Offered	Received
45	Hanson_Defendants_075743	Hanson_Defendants_075743	Dec. 30, 2022 Email from Ye to Hanson RE: Laura Hanson Onboarding			
46	HANSON007663	HANSON007674	Jan. 5, 2023 OKP Google Documents			
47	Hanson_Defendants_075342	Hanson_Defendants_075343	Jan. 10, 2023 Email Exchange b/w Knieling & Hanson RE: Rule 27 training and accommodation process			
48	HANSON008752	HANSON008753	ADA Employee Accommodation Request form			
49	Hanson_Defendants_081798	Hanson_Defendants_081798	Notes from meeting b/w Hanson and Pham			
50	Hanson_Defendants_081839	Hanson_Defendants_081853	Feb. 24, 2023 OKP Staff Meeting Notes			
51	Hanson_Defendants_075730	Hanson_Defendants_075532 HANSON008057	Jan. 25, 2023 Email from Pham RE: Separation memo			
52	Hanson_Defendants_075533	Hanson_Defendants_075534	Mar. 20, 2023 Email from Pham to Knieling & Sanders RE: Laura Hanson – legal hold			
53	Hanson_Defendants_001049	Hanson_Defendants_001086	July 2, 2020 Final Investigation Report by Brenda Baumgart			
54	Hanson_Defendants_001236	Hanson_Defendants_001240	Sept. 23, 2020 Addendum to Final Investigation Report by Brenda Baumgart			
55	HANSON008052	HANSON008055	Jan. 1, 2021 Khanh Pham Legislative Assistant Position Description			
56	HANSON007704	HANSON007707	Dec. 23, 2022 email from Pham to Hanson RE: following up!			
57			Impeachment Exhibit			
58			Impeachment Exhibit			
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62			Impeachment Exhibit			

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103			Impeachment Exhibit			
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105			Impeachment Exhibit			
106			Impeachment Exhibit			
107			Impeachment Exhibit			

Dated: April 11, 2024.

/s/ Rebecca Cambreleng

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CERTIFICATE OF SERVICE

I certify that on April 11, 2024, I served the foregoing **PLAINTIFF'S TRIAL EXHIBITS** upon the parties hereto via electronic means through the Court's Case Management/Electronic Case File system and via electronic mail:

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